

# **International Tungsten Industry Association**

4 Heathfield Terrace  
London  
W4 4JE  
UK

Tel: +44 20 8996 2221  
Fax: +44 20 8994 8728  
Email: [info@itia.info](mailto:info@itia.info)  
<http://www.itia.info>

27 March 2009

Dr Ruth M Lunn  
National Institute of Environmental Health Sciences  
PO Box 12233, MD EC-14  
Research Triangle Park  
NC 27709  
USA

Dear Dr Lunn,

**Re: Technical Comments on Expert Panel Report and Listing Recommendation for Cobalt-Tungsten Carbide Powders and Hard Metals**

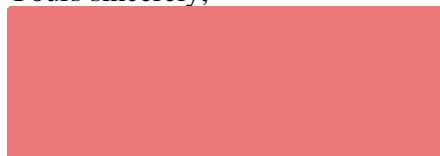
On behalf of the International Tungsten Industry Association (ITIA), I enclose technical comments prepared by ARCADIS on behalf of the ITIA and its Health, Safety and Environment Committee. The ITIA is registered under Belgian law as a not-for-profit association with scientific purposes in support of the tungsten industry. ITIA's members come from 17 countries (including the United States) and include mining companies, processors/consumers, trading companies and assayers. These include the world's leading manufacturers, importers, and users of hardmetal.

As you will see upon review of the enclosed comments, the ARCADIS report identifies very serious concerns with respect to the NTP Expert Panel Part B Report "Recommendation for Listing Status for Tungsten Carbide-Cobalt Powders and Hard Metals and Scientific Justification for the Recommendation." The members of the ITIA therefore request that very careful consideration be given to the concerns raised in the ARCADIS report. I also encourage you and your colleagues to contact Michael Pardus at ARCADIS directly if there are questions with respect to those comments. Mr Pardus can be reached at:

Tel: +1 412 231 6624 ext 5621  
Email: [michael.pardus@arcadis-us.com](mailto:michael.pardus@arcadis-us.com)

ITIA's members look forward to a continuing dialogue with the NTP and its Expert Panel and Interagency Review Panel. As you no doubt realise, the NTP's recommendations could have a profound impact on the hardmetal industry. Consequently, we believe that it is essential that the NTP and its review panels utilise sound science in carrying out its review and making its recommendations.

Yours sincerely,



Michael Maby  
*Secretary-General*

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